

# ALAMPI & DE MARRAIS

Attorneys at Law

A PARTNERSHIP OF PROFESSIONAL LLC'S

ONE UNIVERSITY PLAZA, SUITE 404  
HACKENSACK, NEW JERSEY 07601  
PHONE: 201.343.4600  
FACSIMILE: 201.343.4607

CARMINE R. ALAMPI

THOMAS A. LODATO

JENNIFER ALAMPI\*

MEMBERS OF THE NEW JERSEY BAR  
\*ALSO MEMBER OF THE NEW YORK BAR

*Of Counsel*

MICHAEL F. DE MARRAIS  
SANTO T. ALAMPI

January 29, 2019

## **VIA ECF FILING**

Hon. Peter G. Sheridan, U.S.D.J.  
United States District Court  
402 East State Street  
Trenton, New Jersey 08608

**Re: Association of New Jersey Rifle & Pistol Club, et al. v. Gurbir Grewal, et al.  
3:18-cv-10507-PGS-LHG**

Dear Judge Sheridan,

This firm represents Defendant, James B. O'Connor, in his official capacity as the Chief of Police of the Lyndhurst Police Department, in the above-referenced action. Enclosed please find a proposed consent order extending this Defendant's time to file a responsive pleading.

By Order dated July 17, 2018 (ECF No. 51), Defendants are to file responsive pleadings within fourteen (14) days of the final disposition of Plaintiff's appeal. The Third Circuit mandate (ECF No. 77) was issued on January 17, 2019 making Defendants' responsive pleadings due on January 31, 2018. With the consent of opposing counsel, Defendant, James B. O'Connor, in his official capacity as the Chief of Police of the Lyndhurst Police Department, requests that the Court enter the attached order, extending the time in which to file a responsive pleading an additional fourteen (14) days to February 14, 2019.

Thank you.

Respectfully submitted,  
ALAMPI & DE MARRAIS

  
Jennifer Alampi

cc: All Counsel via ECF

Carmine R. Alampi, Esq.  
Jennifer Alampi, Esq.  
ALAMPI & DE MARRAIS  
One University Plaza, Suite 404  
Hackensack, New Jersey 07601  
Phone: 201.343.4600

*Attorneys for Defendant, James B. O'Connor,  
in his official capacity as the Chief of Police  
of the Lyndhurst Police Department*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY  
TRENTON VICINAGE**

ASSOCIATION OF NEW JERSEY RIFLE & PISTOL CLUBS, INC.,	)	
	)	
BLAKE ELLMAN, <i>and</i>	)	Civil Action No. 18-1507 (PGS)(LHG)
	)	
ALEXANDER DEMBOWSKI,	)	
	)	
<i>Plaintiffs,</i>	)	
	)	
v.	)	
	)	
GURBIR GREWEL, in his official capacity as Attorney General of New Jersey,	)	
	)	
PATRICK J. CALLAHAN, in his official capacity as Superintendent of the New Jersey Division of State Police,	)	<b>CONSENT ORDER EXTENDING DEFENDANT JAMES B. O'CONNOR'S TIME TO FILE A RESPONSIVE PLEADING</b>
	)	
THOMAS WILLIVER, in his official capacity as Chief of Police of the Chester Police Department,	)	
	)	
JAMES B. O'CONNOR, in his official capacity as Chief of Police of the Lyndhurst Police Department,	)	
	)	
<i>Defendants.</i>	)	
	)	
	)	

This matter having come before the Court upon application of Defendant, James B. O'Connor, in his official capacity as Chief of Police of the Lyndhurst Police Department, by Jennifer Alampi of Alampi & DeMarrais appearing on behalf of Defendant, James B. O'Connor, in his official capacity as Chief of Police of the Lyndhurst Police Department, with the consent of the attorneys for Plaintiffs, for a Consent Order extending Defendant's time within which to file an answer, move or otherwise plead with respect to the Complaint, for an additional period of fourteen (14) days or no later than February 14, 2019, and for good cause shown;

It is on this \_\_\_\_ day of \_\_\_\_\_, 2019;

ORDERED that Defendant, James B. O'Connor, in his official capacity as Chief of Police of the Lyndhurst Police Department, is hereby permitted to file an answer, move or otherwise plead with respect to the Complaint for an additional period of fourteen (14) days or no later than February 14, 2019, and it is

FURTHER ORDERED that a copy of this order shall be deemed served upon all counsel of record via CM/ECF.

---

HON. PETER G. SHERIDAN, U.S.D.J.

HARTMAN & WINNICKI, P.C.  
Attorneys for Plaintiffs

By: /s/ Daniel L. Schmutter  
Daniel L. Schmutter, Esq.

ALAMPI & DEMARRAIS  
Attorneys for Defendant, James B. O'Connor,  
in his official capacity as Chief of Police  
of the Lyndhurst Police Department,

By: /s/ Jennifer Alampi  
Jennifer Alampi, Esq.